



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

EAG/JDG/CMP
F.#2008R00530

271 Cadman Plaza East
Brooklyn, New York 11201

September 16, 2011

By Federal Express

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Re: United States v. Thomas Gioeli, et al.
Criminal Docket No. 08-240 (BMC)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes the following enclosed additional discovery in the above-captioned case. The government also renews its request for reciprocal discovery.

<u>EXHIBIT</u>	<u>DESCRIPTION</u>
1311	Certified Sprint Nextel phone records for (917) 418-5206, (917) 418-5207, (917) 418-5209 and (917) 418-5210, subscribed by "Romantique Limo, Inc.," January 5, 1999 to November 25, 1999 (numbered 1-48)

<u>EXHIBIT</u>	<u>DESCRIPTION</u>
1312	Applications, authorizations, 10-day letters and 20-day letters for various Title III interceptions occurring in 1991 and 1992 at 69-64 Grand Ave., Queens, New York and in the vicinity of the Maspeth Public Library, located at 69-7064 Grand Avenue in Queens, New York (numbered 1-1443)
1313	Miscellaneous papers seized from garbage located at the curb of 3 Frank Avenue, Farmingdale on or about March 16, 1998
1314	Miscellaneous papers seized from garbage at 101 Glengariff Road, Massapequa on or about October 21, 1997
1315	Miscellaneous papers seized from garbage at Credit Resolution, 6 Grace Avenue, Great Neck on or about October 1, 1997
1316	Call detail records for 516-639-4885, subscribed to Funding Consultants, for the period between August 15, 1997 and September 8, 1997
1317a	Telephone record for 718-232-5453, subscribed to Dino Saracino
1317b	Compact Disk containing call detail records for 718-232-5453, 516-242-0727, 516-242-0736, 516-242-0767, 516-242-0787, 516-547-8812, 516-547-8913, 516-547-8914, 516-547-8915, 516-586-0073, 516-586-4080, 516-586-4243, 516-674-0411, 516-674-3606, 718-372-7862, 718-372-7902, 718-378-5500, 718-378-5561, 718-378-5567 and 718-378-5915 for the time period between June 1997 and August 1997
1318	Telephone record for 718-772-0433, subscribed to Richard Greazes
1319	Telephone record for 516-773-7773, subscribed to Salvatore Tese
1320	Telephone record for 516-886-2300, subscribed to John Caruso
1321	Telephone record for 516-752-3167, subscribed to Thomas Gioeli

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September 16, 2011
Page 3

<u>EXHIBIT</u>	<u>DESCRIPTION</u>
1322	Handwritten diagram in connection with the execution of a search of the basement of 1966 76 th Street, Brooklyn on or about November 18, 2008

If you have any questions or requests, please contact us.

Sincerely,

LORETTA E. LYNCH
United States Attorney

By: /s/
Elizabeth A. Geddes
James D. Gatta
Cristina M. Posa
Assistant U.S. Attorneys

cc: Carl J. Herman, Esq. (by ECF) (w/o enclosures)
Louis V. Fasulo, Esq. (by ECF) (w/o enclosures)
David Stern, Esq. (by ECF) (w/o enclosures)
Jane Fisher-Byrialsen, Esq. (by ECF) (w/o enclosures)
Clerk of the Court (BMC) (by ECF) (w/o enclosures)